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Subject: Initial PMACT Roundtable Meeting for the Integrated Rule Development of the Wood Building Products NESHAP

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To: Project File

I. Introduction

The initial roundtable meeting for the flatwood paneling industry was held on June 5, 1997, at the U.S. Environmental Protection Agency's (EPA) facility in Research Triangle Park, NC. The primary purpose of the meeting was to discuss the development of presumptive MACT (PMACT) for the flatwood paneling industry. The discussion focused on potential definitions for flatwood paneling, the MACT partnership approach, information collected to date by EPA on the flatwood paneling industry, and additional data needed by the EPA to develop PMACT and MACT and potential mechanisms for collecting the data. Table 1 lists those participating in the meeting.

II. Discussion

After introductions, Ms. Susan Rasor of Midwest Research Institute (MRI) gave a presentation on the PMACT process, including the roles of the regulatory subgroup and EPA; information collected on the flatwood paneling industry to date and EPA's preliminary list of standard industrial classification (SIC) codes representing the industry; additional data needs and mechanisms for collecting the data; and issues related to MACT. A copy of the presentation is attached. During the presentation, Ms. Rasor indicated that the list of SIC codes identified in the presentation as potentially being affected by the regulation will not be included under this standard. These SIC codes do not include wood building products. Throughout the presentation, several issues and questions were raised by the participants. These are discussed in the following paragraphs.

One of the primary issues raised by those participating in the meeting was the applicability of the rule, that is, what the EPA considers flatwood paneling. This is an issue that the EPA has not made a final decision on to date. The EPA is currently planning on including all wood building products that are finished on a flatline. The original CTG focused only on interior paneling, but the EPA is planning to cover both interior and exterior paneling as well as other wood building products such as doors, windows, flooring, and roofing under this regulation. Mr.

Lewis Wagner asked whether the EPA had developed a definition for flatline finishing. Mr. Almodovar of the EPA indicated that the EPA had not developed a final definition. Mr. Matejka of Akzo was asked how he would define flatline finishing. Mr. Matejka responded that he would define flatline finishing as finishing of all types of products, not necessarily only that are flat, on a horizontal line. The coatings may be applied with typical flatline finishing methods such as roll coating or curtain coating or they may be spray applied.

Mr. Wagner asked how certain products could be exempted from the regulation. Mr. Almodovar indicated that the EPA typically does not like to exempt specific products but prefers to address such issues with a comprehensive applicability section. Listing specific exempt products can cause problems because it is usually impossible to list all exempt products. Enforcement officers in the field then believe that because a product is not specifically listed as exempt it is covered under the regulation.

Industry representatives also asked whether or not laminated products would be covered under the regulation. For many of these products, decorative paper is laminated to the wood. A protective topcoat may then be applied over the paper. Ms. Rasor indicated that the EPA typically looks at all emission sources at a facility that are not covered under another standard. The EPA considers an adhesive a coating, so adhesives used for laminating would also be covered. Mr. Wagner pointed out that in some cases the laminating process was part of the substrate manufacturing process rather than the finishing process. He wanted to know that if the laminating would be covered under the flatwood paneling NESHAP in these situations. The EPA is only planning to cover emissions from the finishing process and related emission sources under this regulation, because the particleboard and plywood NESHAP will cover the substrate manufacturing process. Mr. Almodovar indicated that the EPA would need to see the process and learn more about the industry before making a final decision on this issue.

The paper laminating process may also overlap with the paper, film and foil coating NESHAP. Mr. Almodovar indicated that he would discuss this potential overlap with Mr. Dan Brown, the EPA Project Leader for the paper, film, and foil coating NESHAP. Ms. Rasor indicated that because the finishing will be covered under the flatwood paneling NESHAP, it would likely be in industry's best interest to also cover the laminating under this NESHAP. Otherwise, a facility could be subject to both standards. Mr. Wagner indicated that if laminating will be covered under this standard, the EPA should contact the American Laminating Association. This association represents many of the facilities in the industry that only do laminating, and they should be included in the standards development process.

Industry representatives also requested a clarification on whether or not the standard would also regulate the finishing of wood building products in the field. Ms. Rasor replied that the standard would only regulate factory finishing of wood building products. The national rule for architectural and industrial maintenance coatings will regulate the VOC content of the coatings used in the field.

The industry also expressed concern about the list of HAP that was included in EPA's presentation. Ms. Rasor indicated that this data was compiled from EPA's Toxic Release Inventory System (TRI). These data are reported by industry by SIC code. Therefore, the EPA realizes that the data include HAP that are emitted from processes other than finishing, for example, manufacturing of the substrate. Industry indicated that they believed that because the data could not be segregated to reflect only emissions from the finishing process it should not be presented. Ms. Rasor indicated that the EPA only uses TRI data to identify HAP that might be used by the industry and to provide a rough estimate of the number of major sources.

During the roundtable meeting, the trade associations were invited to introduce themselves by giving some background information on the industries and products they represent. Following is a summary of the information they presented.

Mr. John Bradfield represented the Composite Panel Association at the meeting. Mr. Bradfield stated that the majority of their members do not finish their products. They are typically sold unfinished. A few of their member companies do finish their products at the factory and many of their member companies laminate their products.

Mr. Rob Kaufmann represented the American Forest and Paper Association (AFPA). The AFPA is an umbrella organization representing all segments of the wood products industry. Therefore, they have members that manufacture all types of wood building products. Some of these members manufacture unfinished products and some manufacture finished products, including laminated products.

Mr. Lewis Wagner represented the American Hardboard Association. Members of the Hardboard Association manufacture all types of wood building products including:

- Exterior siding. Approximately 60 percent of the members manufacture exterior siding. The siding is finished in 4 foot by 8 foot panels and is typically finished with an acrylic latex primer.
- Hardboard. Hardboard is typically sold unfinished.
- Class I paneling, including tileboard. Solventborne coatings are still used for finishing tileboard.
- Class II paneling.
- Fiberboard. Fiberboard is typically used in roof insulation and wall sheeting. It is usually not finished, but it may be laminated.
- Doorskins. Mr. Wagner indicated this was a growing segment of the industry.

Mr. Wagner indicated that HAP emissions from finishing have decreased over the years. Mr. Wagner suggested that the EPA look at the Census data at the 8 digit level to obtain more detailed information on which segments of the industry finish their products. Finally, Mr. Wagner indicated that he thought it would be difficult to get some of the small companies involved in the standards development process. These companies are often not members of trade associations,

and will therefore be difficult for EPA to identify.

Mr. Jack Burgess represented the Architectural Woodworking Institute (AWI) at the meeting. Mr. Burgess indicated that most AWI members produce custom products. These products include doors, fixtures, cabinets, and paneling. Most products are spray finished and use primarily solventborne coatings.

The meeting closed with a discussion of issues in the development of MACT, the rationale for developing PMACT, and the next steps in the process. Ms. Rasor presented an overview of issues that have been raised in other MACT standards, particularly coating standards. A significant issue with coating standards is the format of the standard. The group discussed potential options including using the format in the CTG and using the format from other recent MACT coating standards, for example, pounds of HAP per pound of coating solids used (lb HAP/lb solids). The format in the CTG, that is pounds of VOC per 1,000 square feet of product coated would have to be converted to pounds of HAP per 1,000 square feet of product coated. Mr. Matejka indicated that the wood furniture industry and the EPA had looked at a number of potential formats before settling on lb HAP/lb solids. He indicated that the coating suppliers were comfortable with this format and could easily supply the data needed to the manufacturer to calculate this value.

Mr. Allen Irish of the National Paint and Coatings Association (NPCA) questioned the need for PMACT. Mr. Almodovar responded that the EPA was developing PMACT to provide State and local agencies with guidance for making case-by-case MACT determinations under Section 112(g). Industry indicated they were concerned about case-by-case MACT determinations, but they were not sure PMACT was necessary. Ms. Maggie Corbin of the Puget Sound Air Pollution Control Agency indicated that case-by-case MACT determinations would be required for new and reconstructed sources and that it would be in industry's best interest for EPA to have released guidance that the States could use. Otherwise, each State and/or local agency would be making these decisions in a vacuum.

The final area of discussion was the next steps in the process. Mr. Almodovar indicated that the EPA would be working with the regulatory subgroup to collect additional data for use in the development of PMACT. The EPA will also be contacting industry concerning site visits to selected facilities. Eventually, the EPA will probably send out surveys to the industry in order to determine MACT for the industry. In the meantime, the EPA expects to have a PMACT decision by October of this year. Another meeting will be held in the interim to discuss PMACT options, probably in late July/early August.

TABLE 1. PARTICIPANTS IN INITIAL PMACT MEETING FOR FLATWOOD PANELING

Members	Affiliations
Paul Almodovar	Environmental Protection Agency
Jim Berry	Berry Environmental
Kurt Bigbee	American Plywood Association
John Bradfield	Composite Panel Association
Jack Burgess	Architectural Woodworking Institute
Richard Burritt	Willamette
Maggie Corbin	Puget Sound Air Pollution Control Agency
Walt Dindoffer	ABT
Linda Herring	Environmental Protection Agency
Allen Irish	National Paint and Coatings Association
Amy Marshall	Midwest Research Institute
Robert Matejka	AKZO Nobel Coatings
Jim Rabe	Masonite
John Radson	National Hardboard Association
Susan Rasor	Midwest Research Institute
Alex Ross	RadTech International
Anthony Saltis	Midwest Research Institute
Bob Smith	AKZO Nobel Coatings
Sherry Stookey	Lilly Industries
Saba Tahmassebi	Oklahoma Department of Environmental Quality
Louis Wagner	American Hardboard Association
Ingrid Ward	Environmental Protection Agency
Shane Wells	Willamette
Tammy Wyles	Georgia Pacific